

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

IN RE WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

Master Case No. C09-037 MJP

[Consolidated with: Case Nos.
CV09-0134 MJP, CV09-0137 MJP, and
CV09-01557 MJP]

**DEFENDANTS' MOTION TO SEAL
EXHIBITS TO THE SUPPLEMENTAL
YOU DECLARATION**

**NOTE ON MOTION CALENDAR:
AUGUST 26, 2011**

Defendants respectfully submit this Motion to Seal Exhibits to the Supplemental You Declaration (the "Motion") contemporaneously with their Reply in Support of Motion to Compel Production from Boilermakers National Annuity Trust Fund ("Boilermakers"). In the Supplemental Declaration of Jee Young You in Support of Defendants' Reply in Support of Motion to Compel, Defendants have filed or will file under seal the following material:

(1) Exhibit A, which is comprised of excerpts from the June 22, 2008 Callan Report ("Callan Report");

*Defendants' Motion to Seal Exhibits to the Supplemental
You Declaration: (CV09-037 MJP) - 1*

HILLIS CLARK MARTIN & PETERSON P.S.
1221 Second Avenue, Suite 500
Seattle, Washington 98101-2925
Telephone: (206) 623-1745
Facsimile: (206) 623-7789

1 (2) Exhibit B, which is comprised of excerpts from the June 30, 2008 McMorgan
2 Investment Report ("McMorgan Report"); and

3 (3) Exhibit C, which is comprised of excerpts from the Custodian Account Summary
4 at BNT0000099 ("Custodian Account Summary").
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6 The Callan Report has been designated as "Confidential" under the Stipulated
7 Protective Order and Stipulated Order Regarding the "Clawback" of Documents (the
8 "Protective Order") (Dkt No. 213) by Callan Associates, Inc., an investment advisor to
9 Boilermakers. The McMorgan Report has been designated as "Confidential" under the
10 Protective Order by McMorgan & Company LLP, an investment advisor to Boilermakers.
11 The Custodian Account Summary has been designated as "Confidential" under the Protective
12 Order by Boilermakers.
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14 Pursuant to the Paragraph 16(b) of the Protective Order and applicable law, the
15 designating party bears the burden of justifying the sealing or redacting of material that they
16 have designated as "Confidential" by a response to this Motion. Defendants will provide
17 notice of this Motion to third parties Callan Associates, Inc. and McMorgan & Company LLP
18 to allow them the opportunity to justify the sealing of these materials. Accordingly, no
19 proposed order is attached to this motion.
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1 DATED this 12th day of August, 2011.

2 HILLIS CLARK MARTIN & PETERSON P.S.

3 By s/ Brian C. Free

4 Louis D. Peterson, WSBA #5776

5 Brian C. Free, WSBA #35788

6 Hillis Clark Martin & Peterson P.S.

7 1221 Second Avenue, Suite 500

8 Seattle WA 98101-2925

9 Telephone: (206) 623-1745

10 Facsimile: (206) 623-7789

11 Email: ldp@hcmp.com; bcf@hcmp.com

12 OF COUNSEL

13 ADMITTED PRO HAC VICE

14 BINGHAM MCCUTCHEN LLP

15 David M. Balabanian

16 John D. Pernick

17 Frank Busch

18 Three Embarcadero Center

19 San Francisco, CA 94111-4067

20 Telephone: (415) 393-2000

21 Facsimile: (415) 393-2286

22 Email: david.balabanian@bingham.com;

23 john.pernick@bingham.com;

24 frank.busch@bingham.com

25 Attorneys for Defendants

26 WaMu Asset Acceptance Corporation, WaMu

27 Capital Corporation, David Beck, Diane Novak,

28 Rolland Jurgens and Richard Careaga

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of August, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Floyd Abrams - fabrams@cahill.com

Michael H. Barr - mbarr@sonnenschein.com

Walter Eugene Barton -

gbarton@karrtuttle.com, nrandall@karrtuttle.com, danderson@karrtuttle.com

Steve W. Berman -

steve@hbsslaw.com, robert@hbsslaw.com, heatherw@hbsslaw.com

S Douglas Bunch - dbunch@cohenmilstein.com

Steven P Caplow -

stevencaplow@dwt.com, patrickwatts@dwt.com, sheilarowden@dwt.com, jason

Schattenkerk@dwt.com

Kevin P Chavous - kchavous@sonnenschein.com

James J. Coster - jcoster@ssbb.com, managingclerk@ssbb.com, jregan@ssbb.com

Hal D Cunningham - hcunningham@scott-

scott.com, halcunningham@gmail.com, efile@scott-scott.com

Kerry F Cunningham - kerry.cunningham@dlapiper.com

Leslie D Davis - ldavis@sonnenschein.com

Corey E Delaney -

corey.delaney@dlapiper.com, kerry.cunningham@dlapiper.com, richard.hans@

dlapiper.com, patrick.smith@dlapiper.com

Joshua S. Devore - jdevore@cohenmilstein.com, efilings@cohenmilstein.com

Joseph A. Fonti - jfonti@labaton.com, ElectronicCaseFiling@labaton.com

Larry Steven Gangnes -

gangnesl@lanepowell.com, sebringl@lanepowell.com, docketing-

sea@lanepowell.com, donnellyjoss@lanepowell.com

Jonathan Gardner - jgardner@labaton.com

Joseph P Guglielmo - jguglielmo@scott-scott.com, efile@scott-scott.com

Richard F Hans - richard.hans@dlapiper.com, dorinda.castro@dlapiper.com

David Daniel Hoff - dhoff@tousley.com, efile@tousley.com

Julie Hwang - jhwang@labaton.com, ElectronicCaseFiling@labaton.com

Geoffrey M Johnson - gjohnson@scott-scott.com, efile@scott-scott.com

Matthew B. Kaplan - mkaplan@cohenmilstein.com, efilings@cohenmilstein.com

1 Stellman Keehnel -stellman.keehnel@dlapiper.com,patsy.howson@dlapiper.com
 2 Paul Joseph Kundtz -
 3 pkundtz@riddellwilliams.com,mdowns@riddellwilliams.com,mbergquam@ri
 4 ddellwilliams.com
 5 Joel P Laitman -jlaitman@cohenmilstein.com
 6 Bruce Earl Larson -blarson@karrtuttle.com,psteinfeld@karrtuttle.com
 7 Mike Liles , Jr-mliles@karrtuttle.com
 8 Christopher E Lometti -clometti@cohenmilstein.com
 9 John D Lowery -jlowery@riddellwilliams.com,dhammonds@riddellwilliams.com
 10 Douglas C McDermott -doug@mcdermottnewman.com,eric@mcdermottnewman.com
 11 Bradley T. Meissner -bradley.meissner@dlapiper.com
 12 Timothy Michael Moran -
 13 moran@kiplinglawgroup.com,cannon@kiplinglawgroup.com
 14 Brian O. O'Mara -bomara@csgrr.com
 15 Barry Robert Ostrager -bostrager@stblaw.com,managingclerk@stblaw.com
 16 Nancy A Pacharzina -npacharzina@tousley.com,mhottman@tousley.com
 17 Kenneth J Pfahler -kenneth.pfahler@snrdenton.com,nicole.reeber@snrdenton.com
 18 Daniel B Rehns -drehns@cohenmilstein.com,efilings@cohenmilstein.com
 19 Kenneth M Rehns -krehns@cohenmilstein.com
 20 Julie Goldsmith Reiser -jreiser@cohenmilstein.com
 21 Serena Richardson -srichardson@labaton.com,ElectronicCaseFiling@labaton.com
 22 Rogelio Omar Riojas -
 23 omar.riojas@dlapiper.com,nina.marie@dlapiper.com,karen.hansen@dlapiper.com
 24 Darren J Robbins -e_file_sd@csgrr.com
 25 Tammy Roy -troy@cahill.com
 26 Joshua M. Rubins -jrubins@ssbb.com,managingclerk@ssbb.com,jregan@ssbb.com
 27 Stephen M. Rummage -steverummage@dwt.com,jeannecadley@dwt.com
 28 Hollis Lee Salzman -hsalzman@labaton.com,ElectronicCaseFiling@labaton.com
 Paul Scarlato -pscarlato@labaton.com,ElectronicCaseFiling@labaton.com
 Arthur L Shingler -ashingler@scott-scott.com,efile@scott-scott.com
 Gavin Williams Skok -gskok@riddellwilliams.com,dhammonds@riddellwilliams.com
 Richard A Speirs -rspeirs@cohenmilstein.com
 Kim D Stephens -
 kstephens@tousley.com,wcruz@tousley.com,cbonifaci@tousley.com
 Robert D Stewart -stewart@kiplinglawgroup.com,cannon@kiplinglawgroup.com
 Janissa Ann Strabuk -jstrabuk@tousley.com,wcruz@tousley.com

1 Steven J Toll -stoll@cohenmilstein.com,efilings@cohenmilstein.com

2 Mary Kay - Vyskocil mvyskocil@stblaw.com

3 Dennis H Walters -dwalters@karrtuttle.com,wbarker@karrtuttle.com

4 Adam Zurofsky -azurofsky@cahill.com

5 DATED this 12th day of August, 2011 at Seattle, Washington.

6 By s/ Brian C. Free

7 Brian C. Free, WSBA #35788

8 1221 Second Avenue, Suite 500

9 Seattle WA 98101-2925

10 Telephone: (206) 623-1745

11 Facsimile: (206) 623-7789

12 Email: bcf@hcmp.com